

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

J. DOE 1, *et al.*,  
*Plaintiffs*

v.

ELON MUSK, *et al.*,  
*Defendants.*

Case No. 8:25-cv-00462-TDC

PLAINTIFFS' UNOPPOSED SECOND MOTION FOR LEAVE TO  
SUPPLEMENT THE RECORD

Plaintiffs respectfully move for leave to supplement the record in support of Plaintiffs' pending Motion for a Preliminary Injunction, ECF No. 17. Last night, March 4, President Donald Trump twice identified Defendant Musk as DOGE's leader during his joint address to Congress.

To further combat inflation, we will not only be reducing the cost of energy, but will be ending the flagrant waste of taxpayer dollars. And to that end, I have created the brand new Department of Government Efficiency. DOGE. Perhaps you've heard of it. Perhaps. Which is headed by Elon Musk, who is in the gallery tonight. . . .

Under the Trump administration, all of these scams — and there are far worse — but I didn't think it was appropriate to talk about them. They're so bad. Many more have been found out and exposed and swiftly terminated by a group of very intelligent, mostly young people headed up by Elon, and we appreciate it. . . .<sup>1</sup>

It is appropriate for the Court to take judicial notice of the President's remarks because his admissions are "not subject to reasonable dispute" and are "accurately and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201.

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<sup>1</sup> *Full Transcript of President Trump's Speech to Congress*, N.Y. TIMES (March 4, 2025), attached hereto as Ex. 74 at J.R. 921, 922.

Accordingly, we respectfully request the Court take judicial notice of President Trump's admissions and we move for leave to supplement the record with those admissions, attached hereto as proposed Exhibit 74 to the joint record, in the Court's consideration of the relief requested by Plaintiffs in their pending Motion for a Preliminary Injunction. PI Mem. at 29-30, ECF 17. A proposed Order accompanies this Motion.

We conferred with Defendants' counsel and they are not opposed to this Motion.

Date: March 5, 2025

/s/ Tianna J. Mays

Tianna J. Mays,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the date below, I electronically served Plaintiffs' Motion for Leave to Supplement the Record with the Clerk of the Court for the United States Court of the District of Maryland by using the CM/ECF system. I also certify that the foregoing document is being served on Defendants' counsel of record and that service will be accomplished via email.

This 5th day of March 2025,

/s/ Tianna J. Mays

Tianna J. Mays,

[1112140221]

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